

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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SIGALIT YEHUDA,	:	
	:	21-cv-08921 (MMG)
Plaintiff,	:	
	:	
v.	:	DECLARATION OF
	:	STEVEN R. HAFFNER
JOSSEF KAHLON	:	IN SUPPORT
	:	
Defendant/Counterclaim Plaintiff,	:	
	:	
v.	:	
	:	
AVRAHAM YEHUDA,	:	
	:	
Counterclaim Defendant.	:	
-----X	:	

STEVEN R. HAFFNER hereby declares:

1. I am a member of the bar of this Court, and a partner in Gordon & Haffner, LLP, attorneys for the Plaintiff Sigalit Yehuda and Counterclaim Defendants Sigalit Yehuda and Avraham Yehuda and make this declaration to introduce documents, in support of Plaintiff's and Counterclaim Defendants' motion (i) for contempt and related relief and for judgment on the pleadings dismissing Defendant Joseff Kahlon's "Second", "Fifth" and "Eighth" Counterclaims (ECF No. 25), pursuant to FRCP 12(c). I have direct personal knowledge of the matters stated.

2. A true and correct copy of a December 10, 2024 letter from Plaintiff's counsel, Steven Haffner, Esq. to Defendant's counsel Minyao Wang, Esq., is annexed as Exhibit A.

3. A true and correct copy of Plaintiff's Points of Objection to Accounting, dated December 11, 2024 (ECF No. 111), is annexed as Exhibit B.

4. A true and correct copy of May 18, 2024 email from Plaintiff's counsel, Steven Haffner, Esq. to Defendant's counsel Minyao Wang, Esq., is annexed as Exhibit C.

5. A true and correct copy of the transcript of the January 10, 2025 court conference in this case (ECF No. 117), is annexed as Exhibit D.

6. A true and correct copy of the transcript of the February 25, 2025 court conference in this case (ECF No. 128), is annexed as Exhibit E.


7. A true and correct copy of Defendant's "Supplemental Production", served in or about February 2025, is annexed as Exhibit F.

8. A true and correct copy of Defendant's Notice regarding verified statement of accounting, filed October 18, 2024 (ECF No. 109), is annexed as Exhibit G.

9. A true and correct copy of the Court's May 29, 2024 Order (ECF No. 102) directing that Defendant "shall file a verified statement of accounting and any supporting documents on or before September 30, 2024", is annexed as Exhibit G

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 13, 2025


Steven R. Haffner